

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of California

United States of America

v.

Kia Zolfaghari

Defendant(s)

Case No.

3 16 70699
MAGFILED
2016 JUN -7 A 10: 68
SUSAN Y. SOONG
CLERK, US DISTRICT COURT
NO. DIST. OF CA.
LB

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Nov. 14, 2015 through present in the county of San Francisco in the
Northern District of California, the defendant(s) violated:*Code Section**Offense Description*21 U.S.C. 841(a)(1) and 841(b)(1)
(C)Distribution, Manufacture, and Possession with Intent to Distribute Fentanyl,
a Schedule II Controlled Substance

21 U.S.C. 846

Conspiracy to Distribute, Manufacture, and Possess with Intent to Distribute
Fentanyl, a Schedule II Controlled Substance

This criminal complaint is based on these facts:

Please see attached affidavit of DEA Special Agent Austin Curnow.

☒ Continued on the attached sheet.

Approved as to form:

AUSA Rita Lin

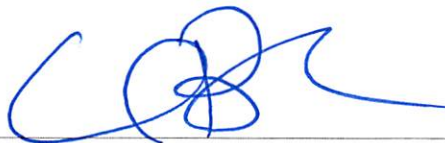


DEA Special Agent Austin Curnow

Printed name and title

Sworn to before me and signed in my presence.

Date:

June 7, 2016*Judge's signature*

City and state:

San Francisco, CA

Hon. Laurel Beeler, U.S. Magistrate Judge

Printed name and title

1dx

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☒ COMPLAINT ☐ INFORMATION ☐ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 21 U.S.C. 841(a)(1) & 841(b)(1)(C) (Distribution of,
 manufacture of, and possession with intent to distribute
 fentanyl)

 21 U.S.C. 846 (Conspiracy to distribute, manufacture, and
 possess with intent to distribute fentanyl)

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

 PENALTY: For each count: Maximum 20 Years Imprisonment; Maximum Fine
 of \$1,000,000 or twice the gain or loss; Minimum Supervised
 Release of 3 Years; Maximum Supervised Release of Life;
 Mandatory \$100 Special Assessment; Deportation; Mandatory and
 Discretionary Denial of Federal Benefits

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

Kia Zolfaghari

DISTRICT COURT NUMBER

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☐ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

Name and Office of Person

Furnishing Information on this form Brian J. Stretch

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Rita Lin

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) ☐ If not detained give date any prior
 summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☐ On another conviction } ☐ Federal ☐ State
- 6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed
DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: No bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments: